

**UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF VIRGINIA**

BEDFORD, FREEMAN & WORTH  
PUBLISHING GROUP, LLC d/b/a MACMILLAN  
LEARNING, *et al.*,

Plaintiffs,

v.

SHOPIFY INC.,

Defendant.

Case No. 1:21-cv-01340-CMH-JFA

**JOINT MOTION FOR ENTRY OF STIPULATED PROTECTIVE ORDER**

Pursuant to Rule 26(c) of the Federal Rules of Civil Procedure, the parties, by and through their respective counsel, hereby respectfully jointly move for entry of the attached proposed Stipulated Protective Order.

Dated: March 30, 2022

Respectfully submitted,

/s/ Jessica Stebbins Bina

/s/ Scott A. Zebrak

David L. Johnson (VSB No. 89289)  
Sarang Vijay Damle (*pro hac vice*)  
Elana Nightingale Dawson (*pro hac vice*)  
Sarah Tomkowiak (*pro hac vice* application  
pending)  
Nicholas L. Schlossman (*pro hac vice*  
application pending)  
LATHAM & WATKINS LLP  
555 Eleventh Street NW, Suite 1000  
Washington, DC 20004  
(202) 637-2200 / (202) 637-2201 Fax  
Email: david.johnson@lw.com  
Email: sy.damle@lw.com  
Email: elana.nightingaledawson@lw.com  
Email: nicholas.schlossman@lw.com

Matthew J. Oppenheim (*pro hac vice*)  
Scott A. Zebrak (38729)  
Michele H. Murphy (*pro hac vice*)  
Corey Miller (*pro hac vice*)  
OPPENHEIM + ZEBRAK, LLP  
4530 Wisconsin Avenue NW, 5th Floor  
Washington, DC 20016  
202-480-2999 telephone  
866-766-1678 fax  
matt@oandzlaw.com  
scott@oandzlaw.com  
michele@oandzlaw.com  
corey@oandzlaw.com

*Attorneys for Plaintiffs*

Andrew M. Gass (*pro hac vice*)  
Joseph R. Wetzel (*pro hac vice*)  
LATHAM & WATKINS LLP  
505 Montgomery Street, Suite 2000  
San Francisco, CA 94111  
(415) 391-0600 / (415) 395-8095 Fax  
Email: andrew.gass@lw.com  
Email: joe.wetzel@lw.com

Allison L. Stillman (*pro hac vice*)  
LATHAM & WATKINS LLP  
1271 Avenue of the Americas  
New York, NY 10020  
(212) 906-1200 / (212) 751-4864 Fax  
Email: alli.stillman@lw.com

Jessica Stebbins Bina (*pro hac vice*)  
Elizabeth A. Greenman (*pro hac vice*  
application pending)  
LATHAM & WATKINS LLP  
10250 Constellation Blvd., Suite 1100  
Los Angeles, CA 90067  
(424) 653-5000 / (424) 653-5501 Fax  
Email: jessica.stebbinsbina@lw.com  
Email: elizabeth.greenman@lw.com

*Attorneys for Defendant Shopify Inc.*

**CERTIFICATE OF SERVICE**

I HEREBY CERTIFY that on March 30, 2022, I caused the foregoing document to be filed electronically with the Clerk of the Court using the CM/ECF system, which will send a notice of electronic filing to all counsel of record registered with CM/ECF.

/s/ Scott A. Zebrak  
Scott A. Zebrak